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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JEFFREY SCHULKEN AND JENIFER	)	CASE NO. 5:09-cv-02708-LHK
SCHULKEN, individually and on behalf of a	)	
class of similarly situated individuals,	)	<b>STIPULATION AND PROPOSED</b>
Plaintiffs,	)	<b>ORDER TO CONTINUE</b>
v.	)	<b>DISCOVERY DEADLINES</b>
	)	AS MODIFIED
WASHINGTON MUTUAL BANK,	)	
HENDERSON, NEVADA; JPMORGAN CHASE	)	Fifth Am. Complaint filed: 10/14/2011
BANK, N.A.,	)	Judge: Hon. Lucy H. Koh
Defendants.	)	

WHEREAS, on July 27, 2011, the Court issued an Order setting a schedule for the remaining discovery in this case, as follows:

Additional expert disclosures:	November 22, 2011
Additional rebuttal expert disclosures:	December 6, 2011
Discovery cut-off:	January 12, 2012
Deadline for additional dispositive motions:	January 26, 2012

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STIPULATION TO EXTEND DISCOVERY DEADLINES  
CASE NO. 5:09-cv-2708-LHK

1 Hearing on dispositive motions: March 1, 2012, at 1:30 pm  
 2 Pretrial conference: April 11, 2012, at 2:00 pm  
 3 Trial: April 30, 2012, at 9:00 am. Trial length  
 4 is estimated at 10 days.  
 (Dkt. 133).

5 WHEREAS, on October 13, 2011, the Court held a hearing on Plaintiffs' Motion for  
 6 Class Certification which the Court took under advisement;

7 Whereas, on October 14, 2011, Plaintiffs Jeffrey and Jennifer Schulken ("Plaintiffs")  
 8 filed their Fifth Amended Complaint, to which Defendant JPMorgan Chase Bank, N.A.  
 9 ("Defendant") filed its Answer on October 28, 2011;

10 WHEREAS, the Parties are not certain as to what expert discovery may be needed or  
 11 relevant following this Court's ruling on Plaintiffs' Motion for Class Certification;

12 WHEREAS, in the interest of judicial economy and so that they may focus discovery  
 13 on relevant matters only, the Parties seek a 45-day extension of the above deadlines, pending  
 14 the Court's consideration of the motion for class certification;

15 In light of the foregoing, the Parties hereby stipulate and agree, subject to this Court's  
 16 approval, that the above deadlines are extended approximately 45 days as follows:

17 Additional expert disclosures: January 6, 2012  
 18 Additional rebuttal expert disclosures: January 20, 2011  
 19 Discovery cut-off: February 27, 2012  
 20 Deadline for additional dispositive motions: ~~March 12, 2012~~ March 5, 2012  
 21 Hearing on dispositive motions: ~~April 19, 2012, at 1:30 pm~~ April 12, 2012 at 1:30 pm  
 22 Pretrial conference: May 30, 2012, at 2:00 pm  
 23 Trial: June 18, 2012, at 9:00 am. Trial length  
 24 is estimated at 10 days.  
 25  
 26  
 27  
 28

1 This Stipulation is made in good faith and not for the purposes of delaying this  
2 litigation.

3  
4 Dated: November 21, 2011

Dated: November 21, 2011

5 By: /s/ Sean P. Reis

By: /s/ George G. Weickhardt

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20  
21 **ORDER**

22 Pursuant to the stipulation,  
23 IT IS SO ORDERED.

24  
25 Dated: November 22, 2011

  
UNITED STATES DISTRICT JUDGE LUCY H. KOH